

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

---

326 LAND COMPANY, LLC, a Michigan limited liability company,

Plaintiff,

v

CITY OF TRAVERSE CITY, a Michigan Home Rule City, SHAWN WINTER, City Planning Director,

Defendants.

---

Case No. 1:22-cv-45

Honorable Paul L. Maloney

Magistrate Phillip J. Green

**INDEX OF EXHIBITS TO JOINT  
BRIEF IN SUPPORT OF  
SETTLEMENT AGREEMENT**

Ross A. Leisman (P41923)  
James F. Scales (P40639)  
MIKA MEYERS PLC  
Attorneys for Plaintiff  
900 Monroe Avenue, NW  
Grand Rapids, MI 49503  
[rleisman@mikameyers.com](mailto:rleisman@mikameyers.com)  
[jscates@mikameyers.com](mailto:jscates@mikameyers.com)

---

Peter B. Worden (P41899)  
Garan Lucow Miller, PC  
Attorneys for Defendants  
3335 W. South Airport Road, Ste. 5A  
Traverse City, MI 49684  
(231) 941-1611  
[pworden@garanlucow.com](mailto:pworden@garanlucow.com)

---

Exhibit A	Architectural Plans, Sheets A2.1 and A3.4
Exhibit B	Implementation Policy
Exhibit C	Winter deposition excerpts
Exhibit D	2017 Citizen communications regarding adoption of Implementation Policy
Exhibit E	Weston deposition excerpts
Exhibit F	Emails between L. Trible-Laucht and S. Winter
Exhibit G	Letter dated November 18, 2021 – “Stop Work Order”
Exhibit H	Peninsula Place Construction Disbursements
Exhibit I	May 23, 2022 Settlement Proposal
Exhibit J	July 20, 2021 Land Use Permit
Exhibit K	Groundwater and stormwater runoff permits, soil erosion and sedimentation control Permits, utility review permit, right-of-way permit and Fire Department site plan review
Exhibit L	Demolition permit issued by Grand Traverse County

Exhibit M	Building permit issued by Grand Traverse County
Exhibit N	Foundation Framing Plan
Exhibit O	McIntyre deposition excerpts
Exhibit P	Laureto deposition excerpts
Exhibit Q	Molon change order/contract dated November 9, 2021
Exhibit R	Plan Review Application - August 6, 2021
Exhibit S	Touch detail records from Molon
Exhibit T	Payment Request Nos. 1-5
Exhibit U	Photographs from ground level early November
Exhibit V	Elevated photograph of site on November 18, 2021
Exhibit W	City assessment records
Exhibit X	Photographs of law office prior to demolition
Exhibit Y	Peninsula Place Deposits
Exhibit Z	Moore deposition excerpts